

EXHIBIT 12

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ILLINOIS
EAST ST. LOUIS DIVISION**

IN RE DEPAKOTE CASE:	:	
	:	
A.S., a minor, by	:	
Marthee Sansone, individually as	:	
parent and next friend of A.S.	:	
	:	Case No. 17-CV-793-MJR-SCW
Plaintiffs	:	
	:	
vs.	:	
	:	
ABBOTT LABORATORIES, INC.,	:	
	:	
Defendants	:	
	:	

PLAINTIFF'S SUPPLEMENTAL EXPERT DISCLOSURES
PURSUANT TO RULE 26(a)

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 26(a)(2)(A), Plaintiffs identify the following expert witness to testify at trial in the above-captioned case on their behalf.

PLEASE TAKE FURTHER NOTICE, that a signed Report for the retained expert accompanies this disclosure, in compliance with Rule 26(a)(2)(B).

RETAINED EXPERTS:

In addition to those experts previously designated, the following is a retained expert whom Plaintiffs may call to testify at trial, either live or by video deposition. Pursuant to Rule 26(a)(2)(B), an expert report is being produced for the following named experts:

1. David A. Kessler, M.D. – In addition to his attached report in this case (which is the same report with attached schedules which was previously produced to Abbott in, at least, *Raquel v. Abbott*), Dr. Kessler will offer the opinions set forth in his expert reports and prior depositions in the related cases in this litigation, and his trial testimony in *Raquel v. Abbott*, which are incorporated by reference as if fully set forth herein. Copies available upon request.

/s/ Kathryn S. Harrington
W. Lewis Garrison

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 5, 2017, a copy of the foregoing was served on counsel for defendant, Abbott Laboratories.

/s/ Kathryn S. Harrington
Kathryn S. Harrington